

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

SKYLAR WILLIAMS, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

GALDERMA LABORATORIES, L.P.,

Defendant.

Civil Case No. 1:24-cv-02222

Hon Lindsay C. Jenkins

DEFENDANT GALDERMA LABORATORIES, L.P.'S MOTION TO DISMISS

PLEASE TAKE NOTICE that Defendant, Galderma Laboratories, L.P. (“Galderma”), hereby moves to dismiss Plaintiff’s Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim on which relief can be granted, with prejudice. Plaintiff objects to this Motion. Plaintiff’s response to this Motion is due on or before June 20, 2024, and Galderma’s reply in support of its Motion is due on or before July 1, 2024.

Galderma’s Motion is based on this Motion, the accompanying Memorandum of Law, any reply or supplemental briefing Galderma may submit, and any further evidence or argument (including oral argument) that the Court may invite Galderma to present in connection with this Motion.

WHEREFORE, Galderma respectfully requests that the Court dismiss Plaintiff’s Complaint with prejudice.

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

Dated: May 30, 2024

/s/ Anand Agneshwar

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Attorneys for Defendant

Galderma Laboratories, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 30, 2024, the foregoing document was electronically filed with the Clerk of Court for the Northern District of Illinois through the Court's CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Dated: May 30, 2024

/s/ Anand Agneshwar
Anand Agneshwar